

DISTRICT JUDGE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JANE DOE A, an individual, JANE DOE B
individual, JANE DOE C, an individual, JANE
DOE D, an individual,

Plaintiffs,

v.

Veer Hospitality Phoenix LLC; SeaTac Hotels,
LLC; Evergreen Lodging Group, LLC; Madison
Avenue P&L Enterprises, Inc.; G6 Hospitality,
L.L.C.; G6 Hospitality IP, L.L.C.; G6 Hospitality
Property, L.L.C.; G6 Hospitality Purchasing,
L.L.C.; G6 Hospitality Franchising, L.L.C.; Motel
6 Operating, L.P.; HSK212, LLC; Wyndham
Hotels and Resorts, Inc.; NITSI, LLC; Choice
Hotels International, Inc.; and DOES 1-200,
inclusive,

Defendants.

Case No. 2:24-cv-01270-MJP

**STIPULATED MOTION AND
~~PROPOSED~~ ORDER TO EXTEND
DEADLINES**

NOTE ON MOTION CALENDAR:
November 22, 2024

Plaintiff Jane Doe A (“Plaintiff”) and Defendants G6 Hospitality LLC, G6 Hospitality IP
LLC, G6 Hospitality Property LLC, G6 Hospitality Purchasing LLC, G6 Hospitality Franchising
LLC, and Motel 6 Operating LP (together, the “G6 Defendants” and with Plaintiff, the “Parties”),
stipulate and agree as follows and request that the Court enter an order consistent with the
following:

1 1. On August 16, 2024, Plaintiff filed her initial Complaint against, amongst other
2 parties, the G6 Defendants. *See* Docket No. 1. On August 21, 2024, the G6 Defendants waived
3 service of the Complaint. *See* Docket Nos. 9-13.

4 2. On October 21, 2024, the G6 Defendants moved to sever and to dismiss Plaintiff's
5 Complaint. *See* Docket Nos. 38, 40. On November 11, 2024, Plaintiff filed a stipulated motion for
6 leave to file an amended complaint, which mooted the G6 Defendants' motions. *See* Docket No.
7 72; *see also* Docket No. 77.

8 3. On November 11, 2024, Plaintiff also filed her First Amended Complaint. *See*
9 Docket No. 74.

10 4. By operation of Federal Rule of Civil Procedure 15(a)(3), the G6 Defendants'
11 response to the First Amended Complaint is due on November 25, 2024. In order to give the G6
12 Defendants additional time to investigate the facts alleged in the First Amended Complaint and
13 prepare an answer, the parties mutually agreed to extend the G6 Defendants' deadline to answer
14 until December 9, 2024.

15 5. Accordingly, the Parties respectively request that the Court set the G6 Defendants'
16 deadline to answer Plaintiff's First Amended Complaint as December 9, 2024.

17 6. By entering into this stipulation, the Parties hereto do not waive, and expressly
18 preserve, all rights, remedies, and defenses.

1 Dated this 22nd day of November, 2024.

2 SINGLETON SCHREIBER, LLP

DLA PIPER LLP (US)

3 /s/ Meagan Verschueren

/s/ Austin Rainwater

4 Katie Llamas *PHV Applicant*

Austin Rainwater, WSBA No. 41904

Meagan Verschueren *PHV Applicant*

DLA PIPER LLP (US)

5 SINGLETON SCHREIBER, LLP

701 Fifth Avenue, Suite 6900

591 Camino de la Reina, Ste. 1025

Seattle, Washington 98104-7029

San Diego, CA 92108

6 Tel. (619) 771-3473

Tel: 206.839.4800

7 Email: klamas@singletonschreiber.com

E-mail: austin.rainwater@us.dlapiper.com

E-mail: mverschueren@singletonschreiber.com

8 Gerald Singleton (WA 59010)

Ellen Dew *PHV*

gsingleton@singletonschreiber.com

Brett M. Feldman *PHV*

9 Stephen J. Hill (WA 7651)

DLA PIPER LLP (US)

shill@singletonschreiber.com

650 S. Exeter Street, Suite 1100

10 SINGLETON SCHREIBER, LLP

Baltimore, Maryland 21202-4576

450 Alaskan Way South, Ste. 200

Tel: 410-580-4127

11 Seattle, WA 98104

Email: ellen.dew@us.dlapiper.com

12 *Attorneys for Plaintiff*

Email: brett.feldman@us.dlapiper.com

Attorneys for the G6 Defendants

ORDER

IT IS SO ORDERED.

Dated this 25th day of November, 2024.



The Honorable Marsha J. Pechman
United States District Judge

PRESENTED BY:

SINGLETON SCHREIBER, LLP

/s/ Meagan Verschueren

Katie Llamas *PHV Applicant*

Meagan Verschueren *PHV Applicant*

SINGLETON SCHREIBER, LLP

591 Camino de la Reina, Ste. 1025

San Diego, CA 92108

Tel. (619) 771-3473

Email: kllamas@singletonschreiber.com

E-mail: mverschueren@singletonschreiber.com

Gerald Singleton (WA 59010)

gsingleton@singletonschreiber.com

Stephen J. Hill (WA 7651)

shill@singletonschreiber.com

SINGLETON SCHREIBER, LLP

450 Alaskan Way South, Ste. 200

Seattle, WA 98104

Attorneys for Plaintiff

DLA PIPER LLP (US)

/s/ Austin Rainwater

Austin Rainwater, WSBA No. 41904

DLA PIPER LLP (US)

701 Fifth Avenue, Suite 6900

Seattle, Washington 98104-7029

Tel: 206.839.4800

E-mail: austin.rainwater@us.dlapiper.com

Ellen Dew *PHV*

Brett M. Feldman *PHV*

DLA PIPER LLP (US)

650 S. Exeter Street, Suite 1100

Baltimore, Maryland 21202-4576

Tel: 410-580-4127

Email: ellen.dew@us.dlapiper.com

Email: brett.feldman@us.dlapiper.com

Attorneys for the G6 Defendants